



BAKERSFIELD REFINERY

Via Email and Certified Mail
7011 1570 0003 2262 9619

July 20, 2016

David Albright
Manager, Drinking Water Protection Section
U.S. EPA Region IX
77 Hawthorne Street
San Francisco, CA 94105-3901

RE: UIC Application Extension Request

Dear Mr. Albright:

We are in receipt of Michael Montgomery's letter issued to Alon on June 28, 2016 required the submittal of a revised/supplemental UIC application to the EPA by August 15, 2016. Alon is requesting an extension of the submittal date.

Alon reviewed the UIC permit application that was previously submitted to the EPA and found that several proposed injection well locations and horizontal wells are no longer suitable for the refinery. Alon will need to modify the application in order to designate new injection well locations and reduce the number of proposed wells. The changes will require preparation of new maps and cross-sections, and exhibits for the newly proposed injection wells. Additionally, the changes will require the Area of Review to be reevaluated, revision of the corrective action plan, and updating water well information that has recently become available. Casing diagrams of proposed and existing wells will be updated, and wells within the AOR that penetrate the Santa Margarita will be reviewed for changes. Alon will also address the deficiencies identified in the November 14, 2015 Notice of Deficiency issued to Alon by the EPA.

The Division of Oil, Gas and Geothermal Resources (DOGGR) Fruitvale Oil Field Aquifer Exemption became available on Friday, July 15, 2016. It is Alon's intention to align the revised UIC application with information contained in the DOGGR Aquifer Exemption and its supporting documentation. Incorporation of relevant portions of the

6451 Rosedale Hwy, Bakersfield, California 93308
P.O. Box 1551 Bakersfield, California 93302-1551
Telephone: 661-326-4200 • Fax: 661-326-4382

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DOGGR Fruitvale Exemption should clarify the UIC permit application and help to resolve several of the deficiencies identified by the EPA in the Alon's first application.

Alon cannot complete the scope of work required for the revised UIC permit and address the deficiencies noted by the EPA within the timeframe allotted. Alon is respectfully requesting a 45-day extension to the August 15 due date and a new submittal date of September 30, 2016. Alon appreciates your consideration of our request for extension.

Please contact me via email at helen.ordway@alonusa.com or at (661) 326-4422 if you have any questions or comments.

Sincerely,

Helen Ordway
Manager EH&S

Cc: Michael Montgomery, Assistant Director, USEPA Water Division
Michele Dermer, Drinking Water Protection Section